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DRAFT FOR CITY MANAGER

Mr. Herb Finch
Reilly Chemical and Tar
7200 Walker Street
St. Louis Park, Minnesota 55426

Dear Mr. Finch:

During the past several months city personnel have made several visits to the plant site, and have had a number of discussions with you. This plant operation is presently creating major air and water pollution problems. The dumping and spilling of waste effluents has caused a pollution of the ground areas north and south of Highway 7. The maintenance of the plant facilities have been very poor as evidenced by the deteriorated, dilapidated, and unsightly buildings, the plant premises have not been maintained in a reasonably neat and clean condition. Rather the plant area site is littered with miscellaneous junk, especially in certain areas, and generally the premises have been poorly maintained. We note that the operational procedures relating to good house-keeping are very poor throughout the entire operation. Tanks are permitted to overflow, and leaks are not quickly repaired. The resulting spillage and waste is not cleaned up to avoid soil contamination and occupational hazards.

The following work must be completed, as a minimum, to eliminate air and water pollution problems, to reclaim the soil and the underground water, and to improve the over-all plant facilities. This notice shall in no way be construed as a limiting factor for additional orders as the City develops further information on your operation.

Air Pollution:

1. The coal tar distilling operation must have controls on the collecting pans, the storage tanks, and the railroad car pitch loading operation. We are aware of the existing condensing system on the railroad tank car loading operation. ✓

The City also insists that final burning be provided, in addition to the condenser and water scrubber presently being planned by you. However, we also know that any sulfur in the effluent will cause sulfur dioxide problems. 15

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The City also recommends that two sets of control equipment be provided, one for the distilling operation and one for the wood treating operation. We feel that the distance is too great to transport the effluent between the two areas.

2. The autoclaves for the wood treating shall be provided with hoods, exhaust system, and final burning of the effluent. So

3. A shed shall be provided over the "freshly" treated wood from the autoclaves. The shed shall have an exhaust system with final burning of the effluent. So

4. All storage tanks for the wood treating operation shall have controls with exhaust and final burning.

5. The railroad tank car creosote oil loading operation shall have controls with exhaust and final burning.

6. The present open sewer man holes and underground storage tanks must be provided with controls consisting of exhaust and final burning.

7. The cyclone filters for the collection of wood particles may need additional control systems consisting of bag filters.

Water Pollution:

1. The east and south sides of the plant area must be provided with an impervious dike to contain all surface run-off and prevent any other run-off water from entering the plant site.

2. A ponding basin for the storage of all surface run-off with a capacity of 1.13 million cubic feet must be provided within the plant site. This ponding basin shall have an impervious seal on all sides and bottom to prevent seepage into the ground.

A pumping station and discharge force main shall be provided directly to the pre-waste treatment facilities and directly to the city sanitary sewer. The effluent will be pumped to one facility or the other facility depending whether or not the effluent at a particular time meets the required standards for direct discharge into the city sanitary sewer.

4. All process waste effluent shall be collected and treated to the requirements as recommended in the current Water Pollution Control Federation Manual of Practice before being discharged

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by a required pumping station and force main into the City sanitary sewer. No waste will be permitted to be dumped onto or into the ground.

5. All storage tanks shall be diked and provided with an impervious bottom seal in accordance with Water Pollution Control 4.

6. All underground storage tanks including the tar storage tank shall be moved above the ground and diked in accordance to Water Pollution Control 4.

7. All process and treatment areas subject to waste spillage shall be provided with a ground seal to prevent ground seepage and contamination. These areas shall include but not be limited to the areas at either end of the autoclaves, the trackage at either end of the autoclaves, the railroad tank-car loading and unloading areas, the truck tank loading and unloading areas and the pipe tunnels and the above ground pipe runs.

8. All unused and abandoned facilities shall be removed. This includes but is not limited to the storage tanks, the sheds and buildings and the railroad tracks. All holes shall be filled to provide adequate surface drainage to the ponding area. No ponding with the exception of the one designed ponding area will be permitted.

9. All contaminated soil, presently estimated at 150,000 cubic yards, must be removed from the plant site to eliminate further pollution of ground water. This will require an estimated 125,000 cubic yards of clean soil for replacement figuring the ponding area at 42,000 cubic yards and 15 percent shrinkage. This estimate is subject to revision by additional inspections and tests.

10. Reilly Chemical and Tar must assume the costs of removal of approximately 400,000 cubic yards of contaminated soil south of Highway 7 to eliminate further water pollution. You shall replace with clean soil in an amount of approximately 460,000 cubic yards figuring 15 percent shrinkage. The City of St. Louis Park will assume responsibility for all costs in raising the present grades. The above contaminated soil removal and replacement is subject to change with additional tests.

11. Reilly Chemical and Tar must assume all costs of providing observation wells, pumping wells, consultant services, testing, city personnel time and all other costs in reclamation of the

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underground water supply contaminated with phenols from this operation. This shall also include the costs of disposal of the well water contaminated with phenols.

12. Reilly Chemical and Tar shall assume the cost of installing a sump pump in the outlet of the storm sewer for this area, the provision of watertight joints, and the provision of a subsurface drain field throughout the entire area outside of the Reilly Chemical and Tar property and north and south of Highway 7. These are necessary items caused by your industrial dumping of waste in this area. This requirement is subject to change with additional tests and study.

Other:

1. The fence surrounding the plant is in poor repair and must be replaced. Your plant tends to attract children, and a fence must be provided to prevent their trespassing. There are hazards within the plant, and outsiders must be barred. We understood this was going to be done some time ago.

2. All litter including old machinery, dead trees, spilled creosote oils, pitch and tar shall be removed. The premises shall be kept clean at all times.

All ground pollution from your industrial wastes shall be terminated immediately upon receipt of this report. All air pollution equipment for the control of air pollution shall be in operation by June 14, 1970. You should feel free to contact me or any city personnel regarding any questions in this report.

Sincerely,

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